

# Exhibit G

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**STACIE RAY, et al.**

Plaintiffs,

v.

**STEPHANIE MCCLOUD, Director, Ohio  
Department Health, et al.,**

Defendants.

Case No.: 2:18-cv-00272-MHW-CMV

Judge: Michael Watson  
Magistrate Judge: Chelsey Vascura

**DECLARATION OF KARA N. INGELHART**

I, Kara N. Ingelhart, declare under penalty of perjury that the following is true and correct to the best of my knowledge and belief:

1. I am above the age of 18, I am competent to testify, and I have personal knowledge of the matters contained in this declaration.
2. I am a Staff Attorney at Lambda Legal Defense and Education Fund (“Lambda Legal”), and I represent Plaintiffs in this litigation.
3. Lambda Legal is a nationwide non-profit organization that relies upon the contributions of its supporters, and in part upon attorney fees incurred in litigation, to fund its operations.
4. I am licensed to practice law in Illinois and I have been since December 22, 2015.
5. I am also admitted in the United States District Courts for the Northern District of Illinois and the Western District of Michigan, and in the Fourth, Seventh, and Ninth Circuit Courts of Appeals.
6. I have been with Lambda Legal for my entire career, beginning as a Skadden Fellow, then as a law fellow, and then as a staff attorney. I work in Lambda

Legal's Midwestern Regional Office, which is based in Chicago, Illinois. I am a recipient of the National LGBT Bar Association's Best LGBT Lawyers Under 40 Award.

7. I have accumulated experience working on complex constitutional and other federal civil rights litigation similar to the work I performed in this lawsuit.
8. During my time at Lambda Legal, I have acquired specialized experience and knowledge litigating cases involving discrimination against transgender people, including challenging the denial of identity documents that accurately reflect their gender identity. I heavily relied upon that experience and knowledge for my representation of Plaintiffs.

Representative examples of the cases that I have litigated include the following: *F.V. v. Barron*, 286 F. Supp. 3d 1131 (D. Idaho 2018) (counsel in challenge to denial of birth certificates reflecting gender identity); *Karnoski v. Trump*, 926 F.3d 1180 (9th Cir. 2019) (counsel in challenge to ban on open military service by transgender people); *Arroyo González v. Rosselló* (D. Puerto Rico 2018); *Hobby Lobby v. Ill. Human Rights Comm'n; Ill. Dept. of Human Rights; & Meggan Sommerville* (Ill. App. Ct. 2nd Dist. 2021) (*amicus* counsel in denial of restroom access for transgender employee under Title VII); *Evancho v. Pine Richland School District* (W.D. Pa. 2018) (counsel for transgender students in Pine Richland School District challenging a School District resolution that requires transgender student to use restrooms according to their sex assigned at birth). I have also worked with experts regarding the importance of access to accurate identity documents for transgender people, which was relevant to the effective representation of Plaintiffs.

9. My resume detailing my professional qualifications is attached to this Declaration as Exhibit G-1.

10. Along with my co-counsel Elizabeth Bonham, I performed the majority of the attorney work in this litigation. Elizabeth and I have amongst the lowest billing rates of our counsel group.

11. My hours expended working on this case are attached to this Declaration as

Exhibit G-2.

12. The time expended and costs incurred have been reasonable, and the records

submitted are an accurate reflection of the time I expended in this case. I

documented my time in six-minute increments.

13. I exercised billing judgment to prepare these time records. For example, I did not

list time for many small tasks or for any tasks that did not take at least six minutes

to complete.

14. I am seeking fees for 456.2 hours of work on this case at a rate of \$250 per hour. Exhibit G-

2 to this Declaration is a true and correct copy of the task-based itemized charges for my

time in this case, which I have reviewed and approved. I exercised billing judgment to

ensure that the time spent was reasonable and necessary under the circumstances. The

current rates for an attorney with my years of experience in the Chicago market performing

comparable civil litigation would be more than \$300 per hour.

15. The lodestar figure for my work on this case, determined by multiplying my

reasonable hours expended by my reasonable rate, is  $456.2 * 250 = \$114,050$ .

Dated: February 1, 2021

By:/s/ Kara Ingelheart  
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